

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

ROBERT WADE PLUMIER, as Son and  
Personal Representative of the Wrongful Death  
Beneficiaries of ROBERT WADE PLUMIER,  
Deceased, and ESTATE OF ROBERT  
WAYNE PLUMIER, Deceased

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:17-cv-713-DPJ-FKB

MISSISSIPPI DEPARTMENT OF CORRECTIONS,  
SOUTH MISSISSIPPI CORRECTIONAL INSTITUTION,  
WEXFORD HEALTH SOURCES, INC.  
JACQUELYN BANKS, in Her Individual and Official Capacity,  
BRENDA SIMS, in Her Individual and Official Capacity,  
And JOHN OR JANE DOES 1-15, in Their Individual  
and Official Capacities

DEFENDANTS

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**NOTICE OF ENTRY OF APPEARANCE**

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COMES NOW, V. K. Smith, III, of the law firm of Bryan Nelson, P.A., P. O.  
Drawer 18109, Hattiesburg, Mississippi 39404-8109, and hereby enters his  
appearance as counsel of record for and on behalf of the Defendant, Wexford Health  
Sources, Inc., in the above styled and numbered action.

Respectfully submitted, this the 21<sup>st</sup> day of November, 2017.

WEXFORD HEALTH SOURCES, INC.

/s/ V. K. Smith, III

V. K. Smith, III, MSB #7623

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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have this day filed the above and foregoing via ECF filing system, which system sent notice of such filing to:

Douglas L. Tynes, Jr.  
[monte@tyneslawfirm.com](mailto:monte@tyneslawfirm.com)  
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*Attorney for MDOC and SMCI*

This the 21<sup>st</sup> day of November, 2017.

/s/ V. K. Smith, III  
V. K. Smith, III, MSB #7623